



September 1998

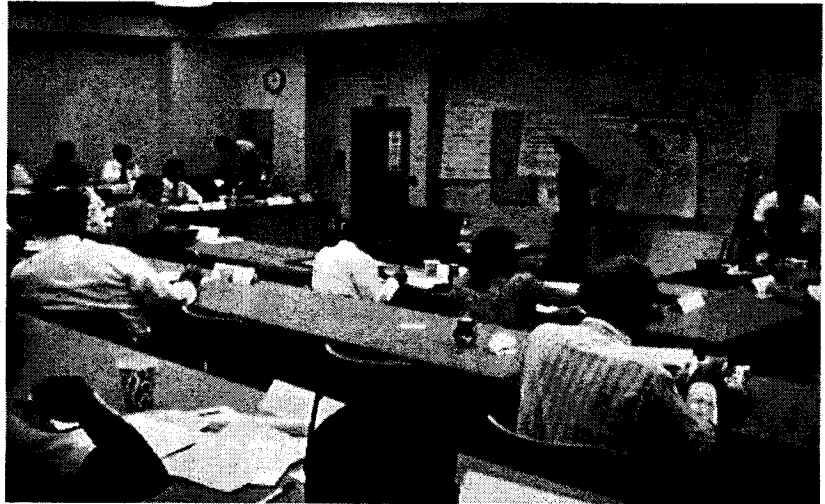
Together, we can solve environmental problems with communities in common sense ways

This Fact Sheet will tell you about:

- The Gateway Initiative
- The 1st Urban Sprawl Initiative Meeting
- A Ground-Water Evaluation Report
- Enforcement Actions in Gateway
- The Resource Conservation and Recovery Act (RCRA)
- Where to get more information

Who are the Gateway Partners?

- U.S. EPA (Regions 5 and 7)
- Illinois EPA (IEPA)
- Illinois Department of Public Health (IDPH)
- East St. Louis Action Research Project (ESLARP)
- East St. Louis Community Action Committee (ESL CAN)
- East St. Louis Housing Authority
- Missouri Department of Health
- U.S. Attorney's Office, Southern District of Illinois
- U.S. Army Corps of Engineers
- Illinois Attorney General's Office
- St. Clair County Sheriff's Department
- New Spirit
- Neighbors United for Progress
- Mississippi River Basin Alliance
- Stop Polluting Illinois (SPILL)
- St. Clair County State's Attorneys Office
- Scott Air Force Base
- Solutia (Monsanto)



Representatives of environmental, community, and political groups attend the 1st Urban Sprawl Initiative Meeting.

GATEWAY ACTIVITIES UPDATE

BACKGROUND

The Gateway Initiative (Gateway) provides a forum to address local environmental issues. Gateway was created by the United States Environmental Protection Agency (U.S. EPA), along with other Federal, State, and local agencies concerned about environmental issues in southern Illinois. The governmental agencies work with local citizens, environmental groups and others to provide creative, common-sense solutions to environmental problems. This fact sheet provides information about ongoing activities in the Gateway region as well as an explanation of the Resource Conservation and Recovery Act (RCRA) which governs waste management activities.

GATEWAY HOSTS 1ST URBAN SPRAWL INITIATIVE MEETING

On Wednesday August 26, representatives of several environmental, community, and political groups met to discuss the issue of urban sprawl at the Illinois Department of Transportation (IDOT) office in Collinsville.

The meeting was designed to gather key stakeholders in the Metro East area together to discuss this multi-faceted issue on a regional level.

According to Jerome King, Gateway Team Manager, "U.S. EPA is here not to serve as a regulator, but as a facilitator. We hope to use

our resources to bring these diverse groups together to solve this issue as a region.”

Topics discussed at the meeting included Transportation, Preservation of Greenspace, and Redevelopment. The next meeting is scheduled for Thursday, November 5, 1998 at the IDOT office in Collinsville. For more information, or to sign-up for the meeting, contact Andy Anderson at 1-800-621-8431, extension 39681. Also check out the Gateway homepage at www.epa.gov/region5/gateway.



Attendees listen attentively to discussions regarding urban sprawl issues at the 1st Urban Sprawl Initiative Meeting.

GROUND-WATER EVALUATION REPORT SUMMARY

From 1977 through 1994, the Illinois Environmental Protection Agency (IEPA) evaluated ground-water quality data reported by 11 industrial facilities located over the American Bottoms Aquifer (which includes the geographic area of western Madison and St. Clair counties along the Mississippi River).

The facilities in this study provide ground-water quality data for the American Bottoms Aquifer or other geologic formations underlying the on-site waste activities in the Gateway area. The results of the study as well as corrective measures currently in place or to be implemented in the future to clean up ground-water contamination at each site are discussed below. Corrective measures are activities undertaken to bring the ground-water quality back to an acceptable level.

The purpose of the study was to evaluate the effectiveness of the permitting process regulating waste

Ground water is water contained within porous rock and soil beneath the surface of the earth. Rock and soil formations which yield useable quantities of ground water are commonly known as aquifers. Contamination of ground water can occur from many sources that include fuel and chemical spills, farm field and roadway run-off, or improper waste management and disposal methods.

management practices at industrial facilities by identifying any ground-water impacts and implementing measures to address the impacts. For instance, as improved design standards and disposal restrictions are implemented over time, through changes in IEPA waste management regulations, a decrease in ground-water impacts would indicate the success of those IEPA regulatory changes.

Ground-water quality at each facility was assessed by comparing the concentration of chemicals at wells located adjacent to the waste activity to concentrations at background wells. (Background wells provide ground-water quality data not impacted by waste activity.) Ground-water quality was further assessed at each facility by comparing conditions at wells located adjacent to the waste activity to Illinois ground-water quality standards. The ground-water quality assessment was completed for 11 chemicals: arsenic, barium, chloride, cyanide, iron, lead, manganese, phenolics, sulfate, total dissolved solids, and zinc. The study determined that permitting procedures successfully identified ground-water impacts and implemented corrective measures to address the impacts. Ten of the 11 facilities were identified by the study as having impacted ground water. The 10 facilities had implemented measures to address impacts as required by the current permit for each facility. Eight of the facilities implemented active corrective measures. (The corrective measures were not required when these facilities began operation nor when permits for the facilities were initially issued.) The other two facilities initiated investigation or assessment of ground-water impacts to determine the significance of the impact and the appropriate corrective measures. The single facility that was not identified by the study as having impacted ground water, has subsequently implemented an assessment of ground water following detection of potential ground-water contaminants. The table on page 3 summarizes the contaminants detected, the current and future cleanup activities, and dates cleanup activities began for each of the facilities.

GROUND-WATER EVALUATION REPORT SUMMARY

American Bottoms Permitted Facilities	Contaminant(s)	Cleanup Activity	Cleanup Activity Began
Amoco Oil	organic/inorganic*	Ground-water extraction system	1981
Chain of Rocks North	organic	Methane gas collection	1990
Chemetco	inorganic	Negotiating corrective action, in the interim, a shallow subsurface ground-water drainage system has been installed	1994
Granite City Steel	inorganic	Assessment on-going	—
Kerr-McGee	organic	Ground-water extraction system	1989
Lacode Steel	inorganic	Investigation on-going, the need for corrective action has not been determined	—
Laidlaw Waste Systems	organic/inorganic	Assessment on-going, corrective actions have not been determined	—
Milam Recycling & Disposal	organic/inorganic	Ground-water extraction trench system	1993
Reilly Industries	organic	Ground-water extraction system	1987
Shell Oil	organic/inorganic	Ground-water extraction system	1989
South-Chain of Rocks Recycling & Disposal	organic/inorganic	Ground-water extraction system and methane gas collection system	1994

*Organic chemicals are any chemicals containing carbon. Inorganic chemicals are chemicals that do not contain carbon. For more information contact: Greg Michaud or Mara McGinnis, IEPA Community Relations (217) 524-2292.

ENFORCEMENT ACTIVITIES IN THE GATEWAY AREA

Shell Oil Company and Shell Wood River Refining Company: A Consent Decree was entered on September 25, 1997, which resolves the Clean Air Action against Shell for violations regarding benzene waste. The Decree requires Shell to pay a \$678,000 civil penalty and to install and operate an enhanced biodegradation unit to control benzene emissions from a previously uncontrolled waste stream. U.S. EPA estimates that the operation of this unit will reduce benzene emissions from Shell's facility by approximately 100 tons per year.

Shell Oil Company and Shell Wood River Refining Company: On November 6, 1996, U.S. EPA issued an Order to Shell requiring Shell to take immediate measures to stop the exposure of migratory birds to solid wastes at its facility. Shell complied by installing physical barriers and developing an oil removal plan.

Olin Corporation: On December 12, 1997, U.S. EPA executed a Consent Agreement and Final Order resolving Olin's self-disclosed RCRA violations. Olin had disclosed to U.S. EPA that between January 3, 1996, and November 7, 1996, Olin made 24 shipments of baghouse dust which exhibited the toxicity characteristic for a type of cadmium to a fertilizer manufacturer, without handling the baghouse dust as hazardous waste. As soon as Olin discovered the error in shipments, it corrected the situation. Since U.S. EPA determined that Olin's self-disclosure met eight of the nine criteria in U.S. EPA's self-policing policy, U.S. EPA reduced Olin's penalty by 75% to \$23,699.

National Steel, Granite City Division: On August 26, 1998, the District Court for the Southern District of Illinois entered a Consent Decree between Na-

tional Steel (National) and U.S. EPA resolving National's violations of the Clean Air Act. U.S. EPA alleged that from January 1993 through June 1995, National violated:

- Illinois State Implementation Plan opacity limits at the facility's basic oxygen furnace shop (opacity limits are an indicator of the amount of light obscured by particulates in the air).
- National Emission Standards for coke by-products recovery plants, coke oven batteries, and equipment.
- Construction permit limits for the facility's coke and coke by-products recovery plants.

Because National achieved compliance with the applicable Clean Air Act requirements during the negotiations in this case, the Decree does not require further corrective measures. The Decree however does require National to pay the United States \$546,700 in penalties and to implement a supplemental environmental project (SEP) and an additional project.

The SEP is a \$2,340,000 dust reduction project which requires National to pave a 2.8 acre area which is heavily traveled by trucks and to maintain the paved roads through weekly sweeping and/or flushing. This SEP will address the complaints of local residents and reduce the particulate matter emissions.

The additional project is a \$50,000 household hazardous waste collection project in the Granite City community which National will co-sponsor with IEPA. This project will target used paint, solvents, pesticides, and other household hazardous materials which might otherwise go to municipal landfills and possibly result in soil and ground-water contamination.

WHAT IS RCRA?

Any site in the Gateway area involved in generating, treating, storing, disposing, or distributing of hazardous waste is governed by the Resource Conservation and Recovery Act (RCRA).

RCRA was passed in 1976 as an amendment to the Solid Waste Disposal Act of 1965 to ensure that solid and hazardous wastes are managed in an environmentally protective manner. RCRA was then amended by the Hazardous and Solid Waste Amend-

ments of 1984 (HSWA). RCRA regulations govern the management of hazardous waste from "cradle to grave." They also restrict the land disposal of hazardous waste, establish treatment standards, require corrective action for releases, and require certain types of hazardous waste management facilities to obtain permits. The RCRA regulations addressing the management of hazardous waste are published as the Code of Federal Regulations (CFR), Title 40, Parts 260 to 299. These regulations establish three categories of hazardous waste handlers: (1) generators, (2) transporters, and (3) treatment, storage, and disposal facilities (TSDFs). Specific parts in the regulation apply to each of the three hazardous waste handler categories.

RCRA allows authorized States to develop and enforce their own regulations governing the management of hazardous waste as long as they are at least as stringent as the Federal regulations. The primary mechanism for assessing compliance with the RCRA regulations is the Compliance Evaluation Inspection (CEI). CEIs are routine inspections of hazardous waste generators, transporters, and TSDFs to evaluate compliance with the applicable State or Federal RCRA requirements.

RCRA gives U.S. EPA the authority to conduct CEIs at hazardous waste facilities. Access to these facilities is granted to "duly designated" officers, representatives, or employees of U.S. EPA, and to officers, representatives, or employees of authorized State hazardous waste programs. HSWA and U.S. EPA/State guidance specifies the frequency of inspections for the three hazardous waste handler categories. For example, HSWA requires that all Federal or State owned/operated TSDFs must be inspected annually.

CEIs may be initiated for routine purposes or "for cause", where probable violations have been observed or brought to the attention of U.S. EPA and/or the State. A CEI encompasses several components. An inspection usually begins with a review of facility records and previous inspection reports prior to the site visit. Once at the facility, an inspector usually starts with a discussion of the facility processes. Focus is centered on the waste generated by these processes and how they are managed. This is followed by a facility tour of waste generation, storage, and/or disposal areas. After the tour, an inspector conducts a review of facility on-site maintenance, sampling,

financial, and administrative records. States usually develop checklists outlining the specific requirements for each category of hazardous waste handler, and use them during an inspection as a guideline to ensure a complete investigation. Upon completion of the tour and record review an evaluation can be made of a facility's hazardous waste management practices and its compliance with the applicable requirements of RCRA.

The RCRA enforcement program uses formal and informal mechanisms to address violations and ensure that hazardous waste management is protective of human health and the environment. Evidence of non-compliance obtained during an inspection can result in a number of actions by U.S. EPA or the authorized State. A warning letter (Notice of Violation or Notice of Deficiency), or an administrative order or civil action requiring compliance and a payment of a penalty might be sent to the facility. For facilities with or requiring a permit, a permit denial or modification may result from non-compliance. A criminal investigation or action might also be appropriate in some cases.

To report a potential environmental violation, please call the Illinois EPA (IEPA) Collinsville office at (618) 346-5120.

The Gateway Team would like to thank William Muno, Region 5 Superfund Director, for his stewardship during the last four years. Mr. Muno's guidance and support have been an invaluable resource to the team, and will be sorely missed. In addition, we very much look forward to working with Elissa Speizman, EPA Region 5 Public Affairs Director, as our new sponsor. The Gateway Team realizes that with change comes new perspectives and fresh outlooks, and hopefully this will only lead to newer and greater successes.

MAILING LIST

If you did not receive this fact sheet in the mail, you are not on our mailing list. If you would like to be on the Gateway Initiative mailing list, please fill out this form and mail it to:

Gordie Blum (P-19J)

Community Involvement Coordinator

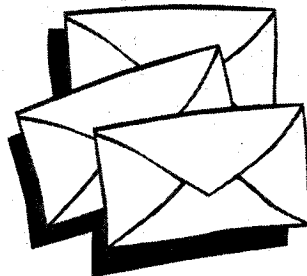
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FOR MORE INFORMATION

Should you have any questions on the information in this fact sheet or seek more information on the Gateway Initiative feel free to contact the following individuals:

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